

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

HELENA KRIZEK,

Plaintiff,

-against-

THE QUEENS MEDICAL CENTER,  
DR. CHERYLEE CHANG,  
DR. THOMAS S. GALLACHER,  
DR. NOBUHIRO ARIYOSHI,  
EDQUON LEE, ESQ., MARGARET WILLE  
AND ASSOCIATES LLC.,  
MARGARET WILLE ESQ.,  
WILLIAM A. BORDNER ESQ.,  
DR. HAO CHIH HO, LEGACY OF LIFE  
HAWAII, LIONS EYE BANK OF HAWAII,  
HAWAII STATE DEPARTMENT OF HEALTH,  
DR. CHRISTOPHER HAPPY MEDICAL  
EXAMINER OF HONOLULU, IN HIS  
OFFICIAL & INDIVIDUAL CAPACITY,

Defendant(s).

Case No. 24-cv-07727 (JHR)

**DECLARATION OF  
JOHN-ANDERSON L. MEYER  
IN SUPPORT OF MOTION TO  
APPEAR *PRO HAC VICE***

I, John-Anderson L. Meyer, declare as follows:

1. I am a partner at the law firm of Dentons US LLP, and I am counsel for Defendants The Queen's Medical Center, Dr. Cherylee Chang, Dr. Thomas S. Gallacher and Dr. Hao Chih Ho, Inc.
2. I respectfully submit this declaration in support of my Motion to Admit Counsel *pro hac vice*.
3. I am a member in good standing of the bar of the State of Hawai'i and was admitted on October 13, 2006.

4. I attach a certificate of good standing from the Supreme Court of the State of Hawai'i, which was issued within thirty days of this filing, as **Exhibit A** to my motion for admission *pro hac vice*.
5. I have never been convicted of a felony or been the subject of any criminal conviction.
6. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.
7. I have never been the subject of a disciplinary sanction and there are no disciplinary proceedings presently pending against me.

Wherefore your declarant respectfully submits that he be permitted to appear as counsel *pro hac vice* in this one case on behalf of Defendants The Queen's Medical Center, Dr. Cherylee Chang, Dr. Thomas S. Gallacher and Dr. Hao Chih Ho, Inc.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Honolulu, Hawai'i  
November 19, 2024



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JOHN-ANDERSON L. MEYER

# **EXHIBIT A**

# IN THE SUPREME COURT OF HAWAI'I

In the Matter of

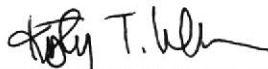
**JOHN-ANDERSON LAIRD MEYER**

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Attorney at Law.

## CERTIFICATE OF STANDING

I, Kristy T. Uemura, clerk of the Supreme Court of the State of Hawai'i, do hereby certify that **John-Anderson Laird Meyer** is an attorney and was admitted to practice as an attorney, counselor and solicitor in all the courts of the State of Hawai'i on October 13, 2006. This attorney's current status is active and they are presently in good standing.

DATED: Honolulu, Hawai'i, November 15, 2024.



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Clerk, Supreme Court of Hawai'i